

## **ATTACHMENT 6: PROGRAM PREFERENCES**

Attachment 6 is mandatory and includes a discussion of how the Pajaro River Watershed Long Term Drought Preparedness Proposal assists in meeting numerous Program Preferences; however this discussion focuses on the Program Preferences listed in Table 8.1 and documented in the following sections.

| <b>TABLE 6.1 PAJARO RIVER WATERSHED LONG TERM DROUGHT PREPAREDNESS PROGRAM PREFERENCES</b> |   |  |
|--|---|--|
| <b>PROGRAM PREFERENCE</b>  | <b>SBCWD Hollister Hexavalent Chromium Compliance Project</b>   | <b>Watsonville Hexavalent Chromium Treatment Project</b>   |
| Human Right to Water Policy  | The flow weighted Chromium 6 levels will be reduced from 14.1 ppb to 8.6 ppb with the new blend supply, below the 10 ppb MCL.   | The flow-weighted Chromium 6 levels will be reduced from 14.9 ppb to less than 8 ppb with the new treatment, below the 10 ppb MCL.   |
| Critical Water Quality Need of a DAC   |   | The Chromium 6 MCL is a Primary Drinking Water Standard and the project is required to treat the groundwater wells that have Chromium 6 above the MCL (74% of the City of Watsonville's total potable water supply). |
| Include Regional Program/Integrate Water Management Programs                               | While the West Hills WTP was originally planned to address water supply reliability and water quality (TDS and hardness) in the distribution system, through regional coordination, SBCWD and its partners were able to take advantage of the timing, location, and method of treated water delivery such that the project will also be used to blend groundwater at the City wells to meet the Chromium 6 regulations. |  |

### **6.1 HUMAN RIGHT TO WATER POLICY**

Assembly Bill 685, signed into law in September of 2012, states that “every human being has the right to safe, clean, affordable, and accessible water”. This is known as the Human Right to Water. Until treatment is implemented, the hexavalent chromium (Chromium 6) impacted wells in the Cities of Hollister and Watsonville will not meet primary drinking water standards leaving both cities vulnerable to drinking water MCL violations and unable to serve their communities with a safe and clean water supply. Both projects will preserve the Human Right to Water for 100% of both communities water service areas with 100% degree of certainty, as documented below.

On July 1, 2014, the California Division of Drinking Water (DDW) adopted water quality regulations that limit the levels of Chromium 6 to a maximum of 10 parts per billion (ppb) in drinking water. The City of Hollister's four active potable groundwater wells, which serve approximately 70% of Hollister's water users and 100% of the Low Pressure Zone water users, are above the new Chromium 6 MCL and must be blended with treated CVP water to meet the regulations and be safe for drinking. The City of Watsonville has six critical groundwater wells, which serve approximately 74% of the city's water users, are above the new Chromium 6 MCL and must be treated to meet the regulations and be safe for drinking.

The City of Hollister's groundwater must be blended with treated CVP water to meet the Chromium 6 regulations. The groundwater is currently blended with water treated at the existing Lessalt WTP. A second surface water treatment facility, the West Hills WTP, will begin construction in the fall of 2015 and is funded from a prior Proposition 84 IRWM Implementation Grant; it will serve as the source of treated CVP water required to blend with the City's groundwater to meet the Chromium 6 regulations. The Hollister Hexavalent Chromium Compliance Project (HHCCP) includes the extension of dedicated transmission pipelines to convey treated surface water (from the West Hills WTP) to three existing City groundwater wells and blending facilities at the wells to facilitate mixing. The flow weighted Chromium 6 levels will be reduced from 14.1 ppb to 8.6 ppb with the new blend supply, below the 10 ppb MCL.

The City of Watsonville's groundwater must be treated to meet the Chromium 6 regulations. A technology evaluation identified reduction/coagulation/filtration (RCF) as the most cost effective treatment solution. The purpose of Watsonville Hexavalent Chromium Treatment Project (HCTP) is to ensure safe and affordable drinking water for the residents of Watsonville, by planning and engineering for the construction of the required treatment units. The project

will result in final plans and specifications for the Chromium 6 RCF treatment. The flow-weighted Chromium 6 levels will be reduced from 14.9 ppb to no greater than 8 ppb with the new treatment, below the 10 ppb MCL.

Both projects will ensure the cities of Hollister and Watsonville Human Right to Water is met with a high degree of certainty.

## **6.2 CRITICAL WATER QUALITY NEED OF A DISADVANTAGED COMMUNITY**

A DAC is defined as a community with an annual median household income (MHI) that is less than 80 percent of the statewide annual median household income. An MHI of less than \$48,875 is the DAC threshold. The City of Watsonville has an MHI of \$43,905, based on the 2009-2013 American Community Survey data, which is below the threshold and confirms its DAC status. As shown in Figure 7.1 of Attachment 7, the entire City of Watsonville is within the DAC defined boundary.

The Watsonville Hexavalent Chromium Treatment Project (HCTP) provides a direct water quality benefit to the DAC of Watsonville. The project involves pilot testing and final design of a Chromium 6 groundwater treatment system. As previously stated, on July 1st, 2014 the new 10 ppb MCL for Chromium 6 became effective. The Chromium 6 MCL is a Primary Drinking Water Standard, meaning that the regulatory limit is based on preventing adverse health impacts. In 2013, the groundwater wells that have Chromium 6 above the MCL accounted for 74% of the City of Watsonville's total potable water supply.

Currently, Senate Bill 385 proposes to give water systems up to 5 years to come into compliance with the Chromium 6 standard. In order to meet that timeline Watsonville must move forward with the planning and engineering process as quickly as possible and will require outside funding sources to proceed. If the City can't afford to proceed with design and implementation within the 5 years, then they will be in violation of the Primary Drinking Water Standard until they build treatment or develop an alternative water supply. Unfortunately, no additional surface water is available and it is not reasonable to transport this amount of water from another location. If the City does not meet the deadline, the SWRCB DDW will issue a compliance order with a timeline for the water system to return to compliance. The residents of Watsonville will need to be notified of the non-compliance quarterly, until the drinking water meets the Chromium 6 standard. If Watsonville fails to comply, the City could be subject to fines and enforcement actions and the community would not have access to a safe and affordable drinking water supply.

## **6.3 INCLUDE REGIONAL PROGRAMS & EFFECTIVELY INTEGRATE WATER MANAGEMENT PROGRAMS**

The SBCWD Hollister Hexavalent Chromium Compliance Project is the result of an integration with the regional Hollister Urban Area (HUA) Water Project. The HUA Project was developed in partnership by the City of Hollister (COH), San Benito County (SBC), SBCWD, and Sunnyslope County Water District (SSCWD) to address water supply, water quality, and wastewater discharge requirements through an integrated and comprehensive approach across agency boundaries and throughout the HUA.

The 2011 Hollister Urban Area Water and Wastewater Master Plan and Coordinated Water Supply and Treatment Plan Program Environmental Impact Report (PEIR) recommended alternative involved developing the treatment facilities necessary to fully utilize the region's CVP supplies. To accomplish that objective, SBCWD began construction of the Lessalt Water Treatment Plant in 2014 and will begin construction of the West Hills Water Treatment Plant in 2015. As previously stated, on July 1st, 2014 the new 10 ppb MCL for Chromium 6 became effective. The City of Hollister's four active potable groundwater wells are above the new Chromium 6 MCL and must be blended with treated CVP water to meet the regulations. In response to the Chromium 6 water quality issue, the City of Hollister initiated development of a Chromium 6 Compliance Plan in January 2015. Development of the Chromium 6 Compliance Plan included review of multiple alternatives including:

- Changes to groundwater supply sources,
- Groundwater treatment, and
- Blending with treated surface water from the planned West Hills WTP.

The draft report was completed in July 2015 and recommended an expansion of the West Hills WTP infrastructure to include additional treated water transmission facilities. The additional conveyance will facilitate the required blending of groundwater from Chromium 6 impacted wells with treated surface water to meet the new regulatory requirements. The study documented that this alternative has the lowest capital and life-cycle costs and takes advantage of the economic efficiency of currently planned water supply and treatment facilities to address the Chromium 6 issue in a reliable and cost-effective manner. While the West Hills WTP was originally planned to address water supply reliability and water quality (TDS and hardness) in the distribution system, through regional coordination, SBCWD and its partners were able to take advantage of the timing, location, and method of treated water delivery such that the project will also be used to blend groundwater at the City wells to meet the Chromium 6 regulations.